

To establish that *Tsuei* anticipates Applicants' claims under 35 U.S.C. § 102(e), the Examiner must show that *Tsuei* discloses each and every element of Applicants' claims, either expressly or inherently. *In re Robertson*, 169 F.3d 743, 745 (Fed. Cir. 1999). Furthermore, the identical disclosure "must be shown in as complete detail as is contained in the... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Because *Tsuei* fails to disclose each and every element of each claim, Applicants respectfully request that the rejections under 35 U.S.C. § 102(e) be withdrawn.

Independent claim 4 recites, *inter alia*, "creating a first change of address record at the change of address server representing the change of address information," "electronically transferring the first change of address record to a service center when the identity is valid," "creating a second change of address record at the service center by modifying the first change of address record received from the change of address server," "forwarding the second change of address record electronically from the service center to a forwarding service unit. . .," and "processing, by the forwarding service unit, the second change of address record received from the service center electronically to automatically redirect mail...." Although of different scope, independent claims 6, 8, 14, 55, 63, 66, 68, 74, 115, 126, 128, 130, 136, and 177 recite similar features. Applicants respectfully disagree with the Examiner's comments that all of the elements of claim 4, including the above-recited features, are disclosed in *Tsuei* at col. 3, lines 1-65; col. 5, lines 10-54; col. 6, line 6 - col. 7, line 52.

*Tsuei* discloses an e-mail address management system ("EAMS") (Fig. 3; col. 6, lines 16-20). An e-mail address change may be registered with the EAMS by a

recipient or by an internet service provider ("ISP"). (Col. 10, lines 12-20). Once the e-mail address change is registered with the EAMS, the EAMS may send a new e-mail address over the internet back to the sender ISP so that the sender ISP can forward the e-mail to the recipient's new e-mail address. (Col. 10, lines 12-37). Specifically, *Tsuei* discloses creating only one data record that contains both the old e-mail address and the new e-mail address. (Col. 6, lines 35-41; col. 11, lines 30-33; col. 12, lines 19-23). Thus, *Tsuei*, fails to disclose, among other things, "creating a second change of address record . . .," "forwarding the second change of address record . . . from the service center to a forwarding service unit," or "processing, by the forwarding service unit, the second change of address record," as recited in claim 4.

Moreover, because *Tsuei* discloses only one data record containing both the old and new e-mail addresses, the reference fails to disclose any relationship between a first change of address record and a second change of address record. (col. 11, lines 30-33; col. 12, lines 19-23). Thus, *Tsuei* fails to disclose "creating a second change of address record **by modifying** the first change of address record received from the change of address server" as recited in claim 4.

For at least the foregoing reasons, *Tsuei* does not disclose or teach each and every claim element recited in independent claim 4, and independent claims 6, 8, 14, 55, 63, 66, 68, 74, 115, 126, 128, 130, 136, and 177, which contain features similar to those recited in independent claim 4. Similarly, dependent claims 5, 7, 9-13, 15-20, 56-62, 64-65, 67, 69-73, 75-80, 116-122, 127, 129, 131-135, 137-142, and 178-184 incorporate the elements discussed above with respect to claim 4, and therefore, *Tsuei* fails to disclose every element of these dependent claims. Accordingly, Applicants

request the withdrawal of the 35 U.S. C. § 102(e) rejections of claims 4-20, 55-80, 115-122, 126-142, and 177-184.

**CONCLUSION**

The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statements are identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

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By:

Judy W. Chung  
Reg. No. 61,612

